

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACT. NO. 2:19-cv-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING,)	
ALABAMA, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

DEFENDANT DYNAMIC SECURITY, INC.’S
DEPOSITION COUNTER-DESIGNATIONS

Defendant Dynamic Security, Inc. (“Dynamic”) designates the following deposition excerpts it expects to use in response to deposition excerpts designated by Plaintiff Davita Key in Plaintiff’s Witness List. (Doc. 101, Sections C and D).

1. Dynamic Security’s 30(b)(6) Deponent (Kristal Riddle)

Page 8: Lines 8:21
Page 18: Lines 18-21;
Page 52: Lines 2-10;
Page 54: Lines 1-4;
Page 56; Line 2;
Page 59; Lines 6-17
Page 61: Lines 9-11;
Page 61: Line 20 – Page 62: Line 2;
Page 64: Line 10-Page 65: Line 4;
Page 67: Lines 14-16;
Page 90: Line 5- Page 91: Line 12;
Page 94: Line 16;
Page 104: Lines 12-17;
Page 116: Lines 8-23;

Page 122: Lines 7-13;
Page 127: Line 16;
Page 200: Line 2 – Page 201:18;
Page 201:19-Page 202:8

2. Dynamic Security's 30(b)(6) Deponent (Sherry Spires)

Page 8, Line 20;
Page 15, Line 18- Page 16, Line 6;
Page 16, Lines 4-6
Page 16, Lines 16-22;
Page 17, Line 8 – Page 18, Line 14;
Page 17, Line 18- Page 18, Line 14;
Page 18, Line 6;
Page 18, Lines 19-20;
Page 18, Line 22 – Page 19, Line 7;
Page 19, Line 8 – Page 20, Line 2;
Page 20, Lines 12 –18;
Page 20, Lines 19-22;
Page 21, Lines 15-16;
Page 23, Lines 3-11;
Page 25, Line 5;
Page 25, Lines 17-19;
Page 26, Lines 9-13;
Page 35, Lines 1-5;
Page 35, Line 20-Page 38, Line 1;
Page 37, Line 10;
Page 38, Lines 8-10;
Page 38, Lines 18-19;
Page 43, Line 6-Page 44, Line 7;
Page 44, Lines 15-17

3. Hyundai Eng America's 30(b)(6) deponent (Cassandra Williams).

Page 43: Line 13-Page 44: Line 2:
Page 51: Lines 10-23;
Page 84: Lines 11-19;
Page 90: Line 7-Page 92: Line 18;
Page 95: Lines 1-2;
Page 135: Lines 3-7;

Page 137: Line 4-Page 138: Line 3;
Page 138: Line 12-Page 139: Line 19;
Page 140: Line 11-Page 141: Line 16;
Page 141: 19-Page 144: Line 7;
Page 147: Lines 2-6;
Page 156: Lines 8-12

4. Ray Cureton

Page 12: Lines 12-17;
Page 17: Lines 1-3;
Page 17: Lines 9-18;
Page 19: Lines 12-14;
Page 31: Line 15-Page 32: Line 1;
Page 34: Line 22-Page 36: Line 13;
Page 38: Line 6-21;
Page 38: Line 22- Page 43: Line 20;
Page 44: Line 4- Page 45:19;
Page 48: Line 15- Page 49: Line 4;
Page 49: Line 9-Page 51: Line 19;
Page 53: Line 4-Page 53; Line 19;
Page 54: Line 4;
Page 62: Line 6-Page 67: Line 13;
Page 69: Line 22-Page 71: Line 1;
Page 79: Line 9-Page 80: Line 12;
Page 82: Lines 2-9;
Page 82: Line 19-Page 83: Line 6;
Page 91; Line 16- Page 92: Line 3;
Page 94: Lines 20-21;
Page 95: Lines 4-22;
Page 96: Lines 1-3;
Page 97; Lines 14-17;
Page 98: Line 7;
Page 99: Line 4-Page 100: Line 9;
Page 100: Line 12- Page 101: Line 7;
Page 101: Line 23-Page 103: Line 6;
Page 105: Line 23-Page 106: Line 17;
Page 107: Line 23-Page 108: Line 2;
Page 110: Line 10- Page 111: Line 11;
Page 114: Lines 9-18;

Page 116: Lines 1-7;
Page 123; Line 8:
Page 123: Lines 17-19;
Page 124: Lines 5-13;
Page 153: Line 10- Page 154: Line 17;
Page 155: Line 14-Page 157: Line 21

Respectfully submitted,

/s/ Susan W. Bullock

Wesley C. Redmond

Susan W. Bullock

FordHarrison LLP

420 20th Street North, Suite 2560

Birmingham, AL 35203

wredmond@fordharrison.com

Phone: 205-244-5905

sbullock@fordharrison.com

Phone: 205-244-5904

Fax: 205-244-5901

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 2nd day of February, 2023, she electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

Heather Leonard
Heather Leonard, P.C.
2105 Devereaux Cir., Suite 111
Birmingham, AL 35243

Leslie A. Palmer, LLC
Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, AL 35233

Counsel for Plaintiff

David J. Middlebrooks
Whitney R. Brown
Lehr Middlebrooks Vreeland & Thompson, P.C.
P.O. Box 11945
Birmingham, AL 35202

Counsel for Hyundai Motor Manufacturing Alabama, LLC

T. Matthew Miller
Bradley
One Federal Place
1819 5th Avenue N.
Birmingham, AL 35203

Counsel for Hyundai ENG America, Inc.

/s/Susan W. Bullock

Susan W. Bullock